



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

April 26, 2012

Ms. Marlene Dortch, Secretary
Federal Communications Commission
455 12th Street, SW
Washington, D.C. 20554

Re: *In the Matter of Rural Health Care Support Mechanism, and Funding Pilot Program Participants Transitioning out of the Rural Health Care Pilot Program in Funding Year 2012.* WC Docket No. 02-60.

Dear Ms. Dortch,

On April 24, the undersigned met with Trent Harkrader, Chief of the Telecommunications Access Policy Division (TAPD), and TAPD staff Chin Yoo, Linda Oliver and Christianna Barnhart.

MTA reiterated its concerns with funding infrastructure construction through the Rural Health Care Program and the Pilot Program. Such construction is ill advised from both legal and policy perspectives. MTA cautioned against continued funding of pilot projects that have not been subject to proper due diligence in the first place. MTA noted the U.S. GAO report (GAO 11-27), which recommended the establishment of proper guidelines, measurements and standards before proceeding further with Rural Health Care Program projects. MTA also noted that the Commission has not yet concluded its own review of the Rural Health Care Program as proposed in its 2010 Rural Health Care Program Notice of Proposed Rulemaking (see MTA Comments, September 10, 2010.) Thus, it is premature to continue funding for projects that were intended as trial balloons or to transition such experimental projects into the primary Rural Health Care Program.

Respectfully submitted,

/s/
Geoffrey A. Feiss, General Manager
208 North Montana Avenue, Suite 105
Helena, Montana 59601
406-442-4316
gfeiss@telecomassn.org

cc. Trent Harkrader, Chin Yoo, Linda Oliver, Christianna Barnhart